



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SKW/NCG/GMR  
F. #2023R00922

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 12, 2025

By Email and ECF

Avraham C. Moskowitz, Esq.  
Moskowitz Colson Ginsberg & Schulman  
80 Broad Street, Suite 1900  
New York, NY 10004  
Email: amoskowitz@mcgslp.com

Re: United States v. Asif Merchant  
Criminal Docket No. 24-362 (EK)

Dear Mr. Moskowitz:

Enclosed please find supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which is being provided on an external hard drive. The government requests reciprocal discovery from the defendant.

The discovery is being produced pursuant to the Protective Order signed by counsel and entered by the Court on November 7, 2024. ECF No. 22. The "Sensitive Discovery Materials" are Bates-numbered (SDM) AM\_003414.

The government is providing the following:

- Data from a pen register trap and trace device, Bates-numbered AM\_002483;
- Reports from the Federal Bureau of Investigation, Bates-numbered AM\_002484 to AM\_003395;
- Records provided by the Transportation Security Administration, Bates-numbered AM\_003396.
- Records provided by Google LLC in response to a search warrant (24 MC 3639), including materials marked as responsive, Bates-numbered AM\_003397 through AM\_003399;

- Device extractions and relevant materials from the defendant's laptop, Samsung Galaxy cellular phone, and Xiaomi Redmi cellular phone, Bates numbered AM\_003400 through AM\_003413; and
- Relevant materials extracted from an electronic device obtained from a third party, Bates-numbered (SDM) AM\_003414, **marked as Sensitive Discovery Material**.

You may examine the physical evidence discoverable under Rule 16, including original documents and electronic devices, by contacting the undersigned Assistant United States Attorneys to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.  
United States Attorney

By:                     /s/                      
Sara K. Winik  
Nina C. Gupta  
Gilbert M. Rein  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)